



**McNAMEE LOCHNER p.c.**

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May 9, 2018

VIAECF

Chief District Judge Phyllis J. Hamilton  
Oakland Courthouse, Courtroom 3 – 3rd Floor  
1301 Clay Street  
Oakland, CA 94612

Re: W. Knight Foster Partnership v. Saratoga Data Systems, Inc.  
Case No. 16-cv-02406-PJH (SK)

Dear Chief District Judge Hamilton:

I represent the Defendant in this matter, Saratoga Data Systems, Inc., and I write on behalf of both Parties to jointly request a 30-day extension of time for the parties to complete their written settlement agreement.

On April 12, 2018, the Parties engaged in a lengthy mediation with Magistrate Judge Sallie Kim's guidance, and late that evening we placed our settlement on the record. Under the terms of the settlement, the Parties were allowed 30 days to prepare and finalize a written settlement agreement and such other documents as may be necessary to document the terms of the agreement. In addition, Magistrate Judge Sallie Kim retained jurisdiction to resolve further issues that might arise in connection with the settlement.

Plaintiff's counsel (Jeffrey Love, Esq.) and I have communicated about the settlement agreement, and we agree that the Parties need additional time in order to finalize the settlement. Immediately after the mediation, I was occupied with other matters (including medical issues for my mother), and Mr. Love is now out of the country.

Under the circumstances, the Parties jointly request a time extension of 30 days, through June 11, 2018, to complete the settlement documents as contemplated by the settlement stipulation.

Assuming that the foregoing meets with the Court's approval, I ask that the Court countersign this letter on the line indicated and circulate the SO ORDERED letter to counsel.

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I appreciate the Court's courtesy and attention to this matter. Of course, if the Court has any questions with respect to this matter I would be happy to address them.

Very truly yours, McNAMEE

LOCHNER P.C.

*Christopher Massaroni*  
Christopher Massaroni, Esq. 

IT IS SO ORDERED:

Hon. Ph.   
Chief District Judge  


May 9, 2018

Date

cc: Jeffrey Love (via ECF)  
Mark Punzalan (via ECF)  
Brett Hutton (via ECF)